

REMARKS

In response to the Office Action dated June 1, 2005, claims 1, 9, and 14 have been amended. Claims 1-20 are in the case. Reexamination and reconsideration of the application, as amended, are requested.

The Office Action rejected claims 1-13 under 35 U.S.C. § 103(a) as being unpatentable over Weinberg et al. (U.S. Patent No. 6,237,006) in view of Robertson et al. (U.S. Patent No. 6,486,895), and further in view of Monahan et al. (U.S. Patent No. 6,523,037). Also, the Office Action rejected claims 14-20 under 35 U.S.C. § 103(a) as being unpatentable over Weinberg et al. in view of Monahan et al.

The Applicants have amended independent claims 1, 9 and 14. Applicants respectfully request consideration of the newly amended claims.

First, the Applicants submit that the Weinberg et al. reference cannot be used as a reference in combination with Robertson et al. and Monahan et al. This is because the Examiner's reasons for combining the cited references are overridden by a **teaching away**, which the Examiner cannot ignore. In re Gordon, 733 F.2d 900, 221 USPQ 1125 (Fed. Cir. 1984). MPEP 2143.01. When a teaching away exists, the references should not and cannot be considered together. ACS Hospital Systems, Inc. v. Montefiore Hospital, 732 F.2d 1572, 1577, 221 USPQ 929, 933 (Fed. Cir. 1984).

Specifically, Weinberg et al. teaches away from the Applicants' claimed invention because Weinberg et al. disclose a mapping component that scans a Web site and "...builds a site map which graphically depicts the URLs and links of the site...", which is explicitly reserved for webmasters and not end users, like the Applicants' claimed invention (see col. 3, lines 25-30 and "Webmasters Eager for Site Management Solutions Rally Around New Web Management Tool; Mercury Interactive Ships Astra SiteManager, Developers Begin Leveraging Open API", dated Dec. 9, 1996.").

Since Weinberg et al. strictly reserves editing of URLs for administrators and webmasters of the website with its "Astra" software, any provision that would allow end users to edit and modify URLs **would destroy the intended function** of Weinberg et al. For instance, when taking the entire disclosure of Weinberg et al. into consideration, it is clear that the "Astra" software in Weinberg et al. is used for authoring web pages

and for giving Web authors and webmasters the ability to find and edit broken links and URLs.

Unquestionably, Weinberg et al. cannot be used to allow end users the ability to edit the URLs of web sites, like the Applicants' claimed invention. Many functions and features of Weinberg et al. that were explicitly reserved for the authors would be destroyed if end users were allowed to re-author the program. As a result, this "teaching away" prevents obviousness from being established and the case law strictly prohibits combining Weinberg et al. with Robertson et al. and Monahan et al. Consequently, this **teaching away** indicates a clear lack of a *prima facie* case of obviousness. W.L. Gore & Assocs. V. Garlock, Inc., 721 F.2d 1540, 220 USPQ 303 (Fed. Cir. 1983). (MPEP 2143).

Further, the combined cited references are missing the Applicants' claimed "...graphically selecting a subset or group of the plurality of links on the Web page via the graphical user interface by an end user...editing the plurality of links and the selected subset or group of links on the Web page by the end user...and...automatically processing the plurality of links and the selected subset or group of links on the Web page, with each link being processed individually..." Although Robertson et al. disclose link gathering, Robertson et al. does not allow the user to perform link selection and editing on a web page, like the Applicants' claimed invention. Instead, the link gathering in Robertson et al. is done automatically and it is done across a web site and not on a web page (see col. 7, lines 17-32 of Robertson et al.). Accordingly, since the Weinberg et al. reference teaches away and the combined references are missing elements of the claimed invention, the combined cited references cannot render the Applicant's invention obvious, and thus, the Applicants respectfully request the withdrawal of the rejections (MPEP 2143).

With regard to the rejection of the dependent claims, because they depend from the above-argued respective independent claims, and they contain additional limitations that are patentably distinguishable over the cited references, these claims are also considered to be patentable (MPEP § 2143.03).

In view of the arguments and amendments set forth above, the Applicants respectfully submit that the rejected claims are in immediate condition for allowance.

The Examiner is therefore respectfully requested to withdraw the outstanding claim rejections and to pass this application to issue. Additionally, in an effort to expedite and further the prosecution of the subject application, the Applicants kindly invite the Examiner to telephone the Applicants' attorney at **(818) 885-1575**. Please note that all correspondence should continue to be directed to:

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